

Corporate Integrity Policy

Norwegian Air Shuttle ASA (the “Company” or “Norwegian”) and all subsidiaries controlled by the Company are dedicated to conducting business with customers, suppliers, and other stakeholders in a manner that is fair, honest, transparent, and mutually beneficial. We will abide by all applicable laws pertaining to countering bribery and corruption across all the jurisdictions in the countries which we operate. In the context of our operations, crimes associated with our Corporate Integrity Policy encompass a wide range of illegal activities related to but not exclusive to fraud, money laundering, bribery, corruption, insider trading, and other illicit financial activities.

The Company has a zero-tolerance policy for Bribery, Corruption and Financial Crime and this policy demonstrates its approach and stance.

Purpose

This policy serves as Norwegian’s foundation for ethical corporate conduct, financial crime prevention, and legal compliance. It ensures transparency, promotes accountability, and mitigates risks related to corruption, fraud, and regulatory breaches that could damage the Company’s reputation and financial standing. The policy aims to safeguard the integrity of the organization's financial operations and protect against potential reputational risks, financial losses, and legal exposure.

Scope of applicability

Norwegian is a multinational corporation, with subsidiaries in Norway, Sweden, Denmark, Finland, Latvia, Spain, Ireland, and the UK. The Corporate Integrity Policy shall apply to all employees of Norwegian Air Shuttle ASA and any subsidiaries thereof as well as any agents and representatives acting on behalf of Norwegian and their personnel controlled by the Company. The Policy also extends to our affiliated service providers as the Company freely distributes it and urges counterparties to have in force similar policies and procedures.

Commitment

All Employees are required to read and understand The Corporate Integrity Policy. Depending on title and department certain Employees will be required to provide a certification to that effect. We encourage all Employees to ask questions regarding the application of the Corporate Integrity Policy. Employees may direct such questions to their immediate Manager when there are no actual or potential conflict of interest, or to a member of Senior Management. All employees are ultimately responsible for their adherence to the Corporate Integrity Policy.

Waivers and Policy Changes

The Board of Directors approves this policy and holds ultimate authority in decision-making related to its implementation and compliance.

Executive Management is responsible for implementing and communicating the Corporate Integrity Policy to employees and stakeholders. This includes regular training sessions, workshops, and webinars to ensure employees fully understand the policy and how they impact their roles to minimize risk.

While Executive Management enforces the policy across the organization, they are equally subject to it and accountable for full compliance. The Board of Directors reviews the Corporate Integrity Policy annually to ensure its continued relevance and alignment with corporate governance best practices and regulatory requirements.

Given the significance of the matters outlined in this policy, exemptions will only be approved in limited circumstances, supported by relevant conditions. The authority to grant waivers or make any modifications to the Corporate Integrity Policy is exclusively held by the Board of Directors and must be promptly disclosed.

Compliance with Laws, Rules and Regulations

Norwegian shall comply with the various laws, rules and regulations of the countries and regulatory authorities that affect the Company's business. If there are differences between laws and regulations and the standards set out in this policy, the highest standards consistent with applicable local laws shall be applied. Questions with respect to your duties under the law should be directed to your manager.

The regulatory environment is dynamic and intricate. This policy addresses the primary legislative obligations within the frameworks in which we function. It is not meant to be an exhaustive compilation of all pertinent legislation but aims to convey the applicable laws in accordance with the following.

- Foreign Corrupt Practices Act and UK Bribery ACT 2010
- Office of Foreign Assets Control (OFAC) sanctions, European Union Sanctions, United Nations Security Council sanctions and HM Treasury (UK) sanctions
- EU 6th Directive on Anti-Money Laundering (AML) and counter terrorist financing (CTF)
- The Norwegian Competition Act, Treaty on the functioning of the European Union (TFEU), The competition act 1998 (UK) and the Enterprise act 2002 (UK)
- The Norwegian Penal Code of 2005
- The Norwegian Anti-Money Laundering Act of 2018

Bribery and Corruption

Bribery is the act of offering financial or other incentives with the expectation of gaining an unfair advantage, resulting in actions that are illegal, unethical, a breach of trust, or improper within the context of a person's societal or professional influence. Bribes can take various forms, including money, gifts, loans, fees, hospitality, services, discounts, contract awards, or any other benefits. The scope of bribery includes offering, promising, giving, accepting, or seeking a bribe in exchange for the improper performance of a relevant function or activity, or rewarding improper performance with the goal of securing or retaining business.

Engaging in the facilitation or authorization of bribery, as well as receiving a bribe, directly or indirectly is strictly forbidden by the Company. It is important to note that the offense does not require the actual exchange of the bribe; an agreement to commit the act is sufficient for criminal liability under anti-corruption laws. Breaching bribery laws can lead to imprisonment and significant fines for both individuals and accountable organizations.

The Company strictly prohibits the below:

- Offering payments, gifts or benefits in anticipation of personal or general business advantage.
- Accepting offers from third parties upon expectation of a personal or business advantage.
- Facilitating payments in order to expedite procedures.
- Any form of threats or retaliation against individuals who have raised Anti-corruption concerns.

Corruption is the misuse of a position of trust to obtain an unfair advantage. Bribery facilitates corruption. It's important to clarify that corruption is not exclusively confined to interactions with government officials but rather anyone with sufficient influence. Trading in influence also falls under corruption and is considered a criminal offense under anti-corruption laws as it seriously undermines transparency, fairness and proper functioning systems or institutions.

Trading Influence involves leveraging personal connections or positions of power to manipulate decisions in one's favour, often through favours or actions that compromise fairness or transparency. This often involves using personal connections and can occur in various contexts, such as politics and involvement with third parties or outsourced business, it can raise concerns about corruption, nepotism, or unfair practices in different domains.

Public officials

A Public Official is defined as appointed or elected officials at all levels as government or anyone acting on behalf of a government-controlled entity, employees or public international organizations and political parties.

Employees must exercise heightened caution when dealing with governments, public bodies, and officials. Actions acceptable in private sector dealings may be deemed improper or illegal in these contexts. All interactions with public entities must strictly adhere to applicable rules and regulations. Employees uncertain about the appropriateness of interactions with public officials should promptly consult the Communications and Public Affairs Policy and the Public Affairs team.

Facilitation of payments

The Company prohibits any form of facilitation payments made to a public official meant to expedite or secure administrative processes or outcomes quicker than these are due.

Communications and Public Affairs

Norwegian ensures that all communications and public affairs comply with anti-bribery and corruption laws to safeguard corporate integrity. Employees are expected to conduct all interactions with transparency, honesty, and integrity while following the Communications and Public Affairs Policy.

Employees must refrain from disclosing confidential financial or strategic information to unauthorized third parties, including media and investors. All media engagements require prior approval from the Communications Team to ensure consistency and compliance with Norwegian's ethical standards.

Activities must be approached with caution and integrity, avoiding any corrupt, illegal, or improper influence. Employees engaging in public affairs must ensure their actions remain transparent and are pre-approved by the Public Affairs Team. To maintain alignment with Norwegian's corporate policies, all public affairs efforts with government representatives, politicians, civil servants, or industry associations representatives must adhere to strict ethical guidelines. Any public affairs activity must be pre-approved by the Public Affairs team to prevent potential conflicts of interest or regulatory breaches. Employees are not permitted to engage with government representatives,

politicians, civil servants, or industry association representatives on behalf of the Company without prior approval from the Public Affairs team. Any statement made on behalf of the Company must be transparent, accurate, and aligned with Norwegian's corporate messaging. Spokespersons representing the Company must be authorized by the Public Affairs team to ensure consistency and compliance.

Employees are strictly prohibited from offering gifts, incentives, or payments to influence public officials.

Violations of Norwegian's Communications and Public Affairs Policy may result in disciplinary action to reinforce compliance with the company's ethical business practices and legal obligations.

Charitable donations and Political donations

Norwegian upholds political neutrality, strictly prohibiting contributions to political parties. The Company is committed to awarding donations and grants based on transparent and objective criteria. Charitable contributions are never made with the intention of securing commercial advantages or favours. Comprehensive written records are diligently maintained for all sponsorships or charitable donations made by the company.

Outsourcing and Third parties

Norwegian acknowledges the inherent bribery risk associated with outsourcing business operations and engaging with external entities. At Norwegian we select our business partners with care. The Company has controls aimed at preventing bribery and corrupt practices and has been tailoring these controls to address the specific risks involved as the regulatory landscape changes. Norwegian and its employees must ensure that all written agreements with Third Parties include standard contract provisions for compliance with Anti-Corruption Laws and this Policy. Furthermore, payments to Third Parties should steer clear of cash transactions and require underlying documentation, such as invoices or receipts, highlighting the provided services.

Anti-money laundry

Money laundering refers to the concealment of the illicit sources of funds or property, derived from criminal activities, by integrating them into lawful business operations. Employees and Business Partners are prohibited from engaging in acts such as concealing, transferring criminal money or property, participating in arrangements facilitating criminal money acquisition, and acquiring or possessing such assets. Company personnel must conduct due diligence on Business Partners, including screening for sanctions, ownership structure, and adverse media. Any knowledge or suspicion of money laundering must be promptly reported.

Sanctions

Governments impose sanctions as economic or trade restrictions against entities violating international law or jeopardizing national security. Compliance checks are essential. Export controls regulate certain items based on origin, end-use, or counterparty. Employees and Business Partners must adhere to local and extraterritorial sanctions and export controls. Due diligence on third parties is required to ensure they are not subject to any restrictions.

Gifts and business courtesies

Norwegian strictly prohibits the offering or acceptance of illegal or inappropriate gifts. Agreements with intermediaries for potentially corrupt payments are also forbidden.

Employees must exercise caution regarding gifts and business courtesies, refraining from acceptance if there's suspicion of influence on business decisions. The Company prohibits giving

or accepting gifts exceeding customary courtesies in business dealings, with a strict prohibition on cash gifts. Hospitality and entertainment are allowed within reasonable bounds but are unacceptable if tied to a 'quid pro quo' or of an inappropriate nature.

Overall, gifts, hospitality, and entertainment should not serve improper purposes or aim to influence individuals in their employment, position, or business. It's essential to be mindful of potential legal offenses related to certain types of corporate hospitality, especially in jurisdictions like Ireland. Relevant factors should be considered when assessing the acceptability of such hospitality.

Conflict of interests and related party transactions

Norwegian values individuals' right to privacy and personal interests but expects transparency and loyalty to Norwegian's interests. Employees must refrain from actions or interests that could compromise their ability to perform their work objectively and effectively, emphasizing that service to Norwegian should never take a backseat to personal gain.

A conflict of interest arises when an employee's actions are, or could reasonably appear to be, influenced by personal considerations, duties to entities other than the Company, or potential personal benefit. To address this, employees are required to:

- Strive to avoid conflict of interest situations.
- Ensure transactions with related parties follow relevant principles.
- Obtain pre-approval from their manager for any directorships or assignments outside Norwegian.
- Ensure external duties do not adversely affect their relationship with Norwegian and align with Norwegian's business interests.
- Immediately report any actual or potential conflicts of interest to their manager and follow instructions on addressing them.
- Conflicts of interest may involve various parties and activities such as customers, suppliers, colleagues, competitors, or outside business engagements.

Anti-trust

Employees are expected to engage with the Company's customers, suppliers, competitors, and colleagues honestly, ethically, and fairly. Unfair advantage-taking through manipulation, concealment, misuse of privileged information, misrepresentation of facts, or any other unfair-dealing practices is strictly prohibited.

Honest conduct is defined as behaviour devoid of fraud or deception, while ethical conduct aligns with accepted professional standards. Under no circumstances should employees participate in or contribute to any violation of general or specific competition regulations. This includes but is not limited to illegal cooperation on pricing, illicit market sharing, or any actions contravening relevant competition laws.

Accurate and timely information and financial reporting

Norwegian will communicate relevant business information in full and on a timely basis to its employees and external stakeholders. All accounting and financial information, as well as other disclosure information, must be accurately registered and presented in accordance with laws, regulations and relevant accounting standards. Norwegian is committed to providing the financial markets with quality information, enabling investors and analysts to maintain a correct picture of the financial situation. The Company will provide accurate disclosure information to the financial

market in line with all relevant laws and regulations for listed companies on the Oslo Stock Exchange. All material information is disclosed to recipients equally in terms of content and timing.

Securities trading

Investment by employees in Norwegian securities is encouraged. However, as a public company, Norwegian is subject to strict laws governing the purchase and sale of its shares and other publicly traded securities. Company policy strictly prohibits employees and their family members from trading securities while in possession of material, non-public information relating to Norwegian or any other company, including a customer or supplier with a significant relationship with the Company.

Information is considered "material" when a reasonable investor would likely find it important when making a decision to buy, hold, or sell securities. Any information that could reasonably affect the price of securities is classified as material. Information is considered "public" only when it has been officially released through appropriate channels and sufficient time has passed for the market to absorb and evaluate it.

If there is any uncertainty about whether information qualifies as material, non-public information, employees should consult Investor Relations for guidance.

In addition to general securities trading restrictions, Norwegian adheres to the Market Abuse Regulation (MAR) and the Norwegian Securities Trading Act to prevent the misuse of inside information. Employees and Board of Directors must ensure strict compliance with these regulations to avoid financial misconduct.

Primary insiders, including directors, officers, and senior managers, are subject to specific reporting and insider trading obligations. Any employee classified as a primary insider must obtain pre-clearance before executing any trade involving Norwegian securities. Furthermore, all insider transactions, including those conducted by closely associated persons, must be reported to Norwegian's Investor Relations department and Finanstilsynet within three working days.

Handling of inside information must follow strict confidentiality protocols to prevent unauthorized disclosures or market manipulation. Employees who come into possession of non-public, price-sensitive information must not share or act upon it, ensuring full compliance with Norwegian's ethical and legal obligations.

Sensitive information and confidentiality

All employees are obligated, by law and by written agreement, to protect the confidentiality of Company information and to keep all matters confidential that could provide third parties unauthorized access to confidential information.

Employees shall exercise caution when discussing internal affairs to avoid being overheard by unauthorized persons.

Confidential information includes such items as non-public information concerning the Company's business, financial results and prospects and potential corporate transactions. The duty of confidentiality also applies when you are no longer working for Norwegian for as long as the information is considered to be of a sensitive nature or in any other way confidential.

Privacy and Data Protection

Norwegian has enacted intercompany agreements for the processing and transfer of personal data of customers, employees and other third parties. The Company has implemented a privacy standard that aims to establish an internal control system containing legally binding principles for the processing of all personal data within Norwegian in accordance with the EU General Data Protection Regulation 2016/679.

Norwegian shall process personal data in a fair and lawful way for legitimate purposes only. The personal data shall be kept confidential, accurate, up to date and stored in a secure way.

Monitoring and Reporting of violations

Crimes such as bribery, money laundering, and violations of international sanctions are deemed severe breaches of this policy and Norwegian's Corporate Code of Business Ethics and Conduct. Such offenses may result in criminal penalties for individuals and the Company alike. Any infractions trigger immediate disciplinary actions, including potential dismissal or contract termination.

All individuals associated with Norwegian are obligated to report any breaches of the Corporate Integrity Policy. Violations should be reported according to the Company's Whistleblowing Policy. The concerns can be raised directly to the whistleblowing committee. Alternatively, reports can be made to superiors, managers, People department, union officials, or safety representatives.